

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

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NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**WILLIAMS PLAINTIFFS' AMENDED PRETRIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's May 23, 2024 Notice of Hearing, ECF No. 50, *Williams* Plaintiffs respectfully submit the following Amended Pretrial Disclosures. *Williams* Plaintiffs reserve the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants' Pretrial Disclosures, as appropriate. *Williams* Plaintiffs also reserve the right to supplement or modify these disclosures based on the Court's rulings on any outstanding issues.

## I. WITNESSES

*Williams* Plaintiffs' Witness List is attached as **Exhibit A**. Because *Williams* Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial, they reserve the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call their witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on another party's witness list and any witness necessary to rebut Defendants' case, arguments, and/or evidence, and/or to authenticate or lay the foundation for the introduction of documents to which Defendants object; (4) reasonably supplement or amend this witness list through and including the time of trial to the extent agreed upon by the parties or permitted by the Court; (5) introduce deposition testimony as impeachment evidence; (6) change a witness from a live witness to a witness testifying by deposition, and vice versa; or (7) change a witness from a live witness to a witness testifying by declaration. *Williams* Plaintiffs reserve the right to supplement or modify this witness list in response to rulings made by the Court. *Williams* Plaintiffs' identification of any witness listed herein is not an admission that the testimony would be admissible if offered by Defendants.<sup>1</sup>

## II. TRIAL EXHIBITS

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<sup>1</sup> Pursuant to the Court's June 4, 2025 Order, the deadline to exchange deposition designations under Federal Rule of Civil Procedure 26(a)(3) for witnesses who become unavailable for trial has been modified to July 17, 2025, and the deadline for objections and counter-designations for deposition designations has been modified to July 22, 2025. ECF No. 135.

*Williams* Plaintiffs' Amended Trial Exhibit List is attached as **Exhibit B**. *Williams* Plaintiffs reserve the right to offer any exhibit identified by any other party in their Pretrial Disclosures and to introduce additional documents as rebuttal or impeachment evidence. *Williams* Plaintiffs also reserve the right to modify, amend, or supplement this exhibit list leading up to and through trial. *Williams* Plaintiffs' identification of any exhibits listed herein is not an admission that the exhibit would be admissible if offered by Defendants. *Williams* Plaintiffs may offer portions of listed exhibits at trial. *Williams* Plaintiffs' list of trial exhibits does not include demonstrative exhibits, which the parties have agreed to exchange shortly before a corresponding witness testifies.

Dated: June 6, 2025

/s/ Narendra K. Ghosh

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*\* Special Appearance pursuant to  
Local Rule 83.1(d)*